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July 25, 2014

**VIA HAND DELIVERY**

EEO Staff  
Policy Division, Media Bureau  
Federal Communications Commission  
Room TW-A325  
445 12<sup>th</sup> Street, S.W.,  
Washington, DC 20554

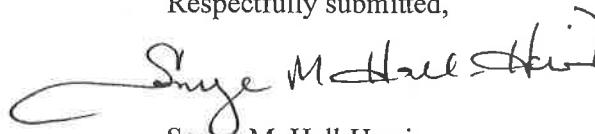
Re: **WOL (AM), Washington, D.C. (FCC ID 54713)**  
**Response to the FCC's June 10, 2014 EEO Audit Letter**

Dear EEO Staff:

Radio One Licenses, LLC ("Radio One"), licensee of WOL (AM), Washington, D.C., hereby responds to the Policy Division's Equal Employment Opportunity audit letter dated June 10, 2014. Please note, WOL(AM) is a part of an EEO station employment unit ("Unit") that also includes co-owned stations WKYS (FM), Washington, D.C. (FAC ID 73200); WMMJ (FM), Bethesda, Maryland (FAC ID 54712); WYCB (AM), Washington, D.C. (FAC ID 7038); and WPRS-FM, Waldorf, Maryland (FAC ID 74212). As directed by the Commission's EEO audit letter, this response contains information regarding the EEO compliance activities for the entire Unit.

Should there be any questions regarding this matter, please contact the undersigned.

Respectfully submitted,



Sonya M. Hall-Harris

Enclosures

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**RESPONSE OF RADIO ONE LICENSES, LLC  
TO JUNE 10, 2014 EEO AUDIT LETTER**Federal Communications Commission  
Bureau / Office

Radio One Licenses, LLC, the licensee of station WOL-AM of Washington, D.C., hereby responds to the Federal Communication Commission's EEO audit letter dated June 10, 2014, as follows:

1. Radio One Licenses, LLC is the licensee ("Licensee") of Station WOL-AM, Washington, D.C., which is part of the station employment unit serving the Washington, D.C. area and includes stations WKYS-FM, Washington, D.C.; WMMJ-FM, Bethesda, Maryland; WYCB-AM, Washington, D.C.; and WPRS-FM, Waldorf, Maryland (collectively, "Unit"). The facts and documents referenced herein are in response to the June 10, 2014 letter of Mr. Lewis C. Pulley, Assistant Chief, Media Bureau Policy Division, announcing a random audit of the Unit's Equal Employment Opportunity (EEO) program (hereinafter, "Audit Letter").
2. The Unit employs five or more full-time employees within the meaning of 47 C.F.R. § 73.2080(e)(1), and each station in the Unit is commonly owned or controlled by Radio One, Inc. ("Radio One"), a minority-controlled broadcasting company.
3. In response to paragraph 3 of the Audit Letter, each of the subparagraph inquiries in the Commission's letter is set forth below and, immediately thereafter, Licensee's response to such inquiry is supplied.

Inquiry 3(a): Copies of the Unit's two most recent EEO public file reports, described in Section 73.2080(c)(6). For any stations in the Unit that have websites, provide each web address. If the Unit's most recent EEO public file report is not included on or linked to on each of these websites, indicate each station involved and provide an explanation of why the report is not so posted or linked, as required by Section 73.2080(c)(6). In accordance with Section 73.2080(c)(5)(vi), provide the date of each full-time hire listed in each report provided. If the unit does not have its own website, but its corporate site contains a link to a site pertaining to the unit, then the unit's most recent EEO public file report must be linked to either the unit's site or the general corporate site, pursuant to 47 C.F.R. § 2080(c)(6).

Response to 3(a): The Unit's two most recent EEO public file reports are attached hereto as Exhibit A. The website addresses of the stations in the Unit are [www.woldcnews.com](http://www.woldcnews.com) [WOL-AM], [www.kysdc.com](http://www.kysdc.com) [WKYS-FM], [www.mymajicdc.com](http://www.mymajicdc.com) [WMMJ-FM], [www.myspiritdc.com](http://www.myspiritdc.com) [WYCB-AM], and [www.praisedc.com](http://www.praisedc.com) [WPRS-FM]. A copy of the Unit's most recent Annual EEO Public File Report can be found in each station's public inspection file and on each station's website.

Pursuant to § 73.2080(c)(5)(vi), the dates of hire for each fulltime position filled during the reporting period of June 1, 2012 through May 31, 2013 are as follows: Accounting Clerk, hired on June 18, 2012; Music Director/Assistant Program Director, hired on June 1, 2012; Account Executive, hired on February 27, 2012, June 25, 2012, July 30, 2012, November 29, 2012, December 31, 2012, April 8, 2013, and July 2, 2013; Regional

Digital Sales Manager, hired on July 1, 2012; Production Assistant, hired on February 19, 2013; and Vice President of National Sales, hired on January 18, 2013. For the reporting period of June 1, 2013 through May 31, 2014, the dates of hire for each fulltime position filled are as follows: Promotions Director, hired on May 29, 2013 and February 28, 2014; Account Executive, hired on September 12, 2013, November 8, 2013, and May 16, 2014; Promotions Coordinator, hired on April 15, 2013; Digital Sales Manager, hired on February 1, 2014; Credit Manager, hired on July 26, 2013; Traffic Manager, hired on September 13, 2013; Continuity Director, hired on September 24, 2013; and General Sales Manager, hired on January 27, 2014.

Inquiry 3(b): For each Unit full-time position filled during the period covered by the above EEO public file reports, or since your acquisition of the Station, if after that period, dated copies of all advertisements, bulletins, letters, faxes, e-mails, or other communications announcing the position, as described in Section 73.2080(c)(5)(iii). However, to reduce your burden responding to this audit, if you have sent a job notice to multiple sources, you may send us only one copy of each such notice, along with a list of the sources to which you have sent the notice. In addition, indicate in your response whether you retain copies of all notices sent to all sources used, as required by Section 73.2080(c)(5)(iii). For on-air ads that aired multiple times, you may send us one log sheet indicating when the ad aired and tell us the other times it aired instead of providing multiple log sheets. Also, tell us whether you have retained all the log sheets for each time the ad aired. We may ask for them for verification, but you need not provide them at this time. Include, however, copies of all job announcements sent to any organization (identified separately from other sources) that have notified the Unit that it wants to be notified of Unit job openings, as described in Section 73.2080(c)(1)(ii). Response to 3(b): Attached hereto as Exhibit B are copies of the relevant supporting documentation announcing the full-time positions that were available (and subsequently filled) during the period covered by the above-referenced EEO public file reports, as described in § 73.2080(c)(5)(iii). During the relevant time period, no organizations notified the Unit that they wanted to be notified of job openings at the Unit, as described in § 73.2080(c)(1)(ii).

Response to 3(b): Attached hereto as Exhibit B are copies of the relevant supporting documentation announcing the full-time positions that were available (and subsequently filled) during the period covered by the above-referenced EEO public file reports, as described in § 73.2080(c)(5)(iii).

Inquiry 3(c): In accordance with Section 73.2080(c)(5)(v), the total number of interviewees for each vacancy and the referral source for each interviewee for all full-time Unit vacancies filled during the period covered by the above-noted EEO public file reports.

Response to 3(c): See Exhibit A hereto, which documents the total number of interviewees for each vacancy and the referral source for each interviewee for all full-time vacancies filled during the period covered by the relevant EEO public file reports.

Inquiry 3(d): Documentation of Unit recruitment initiatives described in Section 73.2080(c)(2) during the periods covered by the above-noted EEO public file reports, such as participation at job fairs, mentoring programs, and training for staff. Specify the Unit personnel involved in each such recruitment initiative. Also, provide the total number of full-time employees of the Unit and state whether the population of the market in which any station included in the Unit operates is 250,000 or more. Based upon these two factors, determine and state whether the Unit is required to perform two or four initiatives within a two-year period, pursuant to Section 73.2080(c)(2) and (e)(3). If you have performed more than four initiatives, you may provide documentation for only four and summarize the rest instead of providing documentation for all of them. If we believe any of the initiatives you have documented are inadequate, we may ask for more information, but documentation for four is all we need at this time.

Response to 3(d): Attached hereto as Exhibit C is documentation of the Unit's performance of recruitment initiatives described under § 73.2080(c)(2) during the relevant time period. The station personnel who were involved in the various recruitment initiatives are identified in the documentation. The Unit employs a total of 60 full-time employees and, upon information and belief, is located in a community with a population of 250,000 people or more. Accordingly, the Unit is required to perform four recruitment initiatives in a two-year period.

Inquiry 3(e): Disclose any pending or resolved complaints involving the Station filed during the Station's current license term before any body having competent jurisdiction under federal, state, territorial or local law, alleging unlawful discrimination in the employment practices of the Unit on the basis of race, color, religion, national origin, or sex. For each such complaint, provide: (1) a brief description of the allegations and issues involved; (2) the names of the complainant and other persons involved; (3) the date the complaint was filed; (4) the court or agency before which it is pending or by which it was resolved; (5) the file or case number; and (6) the disposition and date thereof or current status. Note that all complaints must be reported, regardless of their status or disposition.

Response to 3(e): No discrimination complaints were filed during the current license term.

Inquiry 3(f): In accordance with Section 73.2080(b), from the first day of the Station's current license term (or the date the licensee became the owner, if after that date) until the date of this letter, describe the responsibilities of each level of Unit management responsible for implementing Unit EEO policies and describe how the Unit has informed employees and job applicants of its EEO policies and program.

Response to 3(f): Enforcement of the Unit's EEO policies is the collective responsibility of the Unit General Manager, Radio One's Human Resources Department, and Radio One's Legal Department, each of which has assumed an active role in ensuring and policing the Unit's compliance with the letter and spirit of Company EEO policies and the Commission's EEO rules for broadcast stations. Collectively, the three levels of management ensure the Unit's compliance. For example, the General Manager of the

Unit is responsible for contacting recruitment sources and conducting non-vacancy specific outreach efforts. The Human Resources Department, in consultation with the Unit, assists with broader outreach efforts, and prepares and maintains the necessary documentation to comply with FCC EEO rules. In addition, the Human Resources Department participates in job-specific recruitment tasks for full-time openings, including reviewing and approving the Unit's request for new employees and assisting local managers with the selection process and the eventual hire of new employees. Finally, Radio One's Legal Department oversees the Unit's compliance with FCC EEO rules by monitoring and periodically assessing the Unit's EEO program and the success of its outreach efforts.

Pursuant to § 73.2080(b), the Unit uses a variety of methods to inform employees and job applicants of its EEO policies. Employees are provided copies of Company EEO and nondiscrimination policies, and they also receive periodic training and education regarding same. Job applicants are informed of the Unit's EEO policy on job applications, electronic bulletin boards and postings and other communications that identify the Unit as an equal opportunity employer.

Inquiry 3(g): In accordance with § 73.2080(c)(3), from the first day of the Station's current license term (or the date the licensee became the owner, if after that date) until the date of this letter, describe the Unit's efforts to analyze its EEO recruitment program to ensure that it is effective and to address any problems found as a result of such analysis.

Response to 3(g): Consistent with the Commission's rules, the Unit periodically analyzes the effectiveness of its EEO recruitment program. The Human Resources and Legal Departments meet on a periodic basis to evaluate and discuss recruitment initiatives and EEO compliance. Additionally, during the relevant period, the Company launched Taleo, an automated database that permits the Unit to track applicants, identify referral sources, and communicate information about the Unit's equal employment opportunity policies and practices. . The Unit also continues to regularly notify referral and other recruitment sources about job vacancies through emails, faxes, and postings on various job websites.

The Human Resources Department periodically coordinates with the Unit and other SEUs to ensure the effective use of local recruitment sources. In the past, the Human Resources and Legal Departments have jointly participated in an FCC EEO compliance training seminar conducted by attorneys from the law firm of Davis Wright Tremaine LLP, who specialize in FCC EEO compliance. Additionally, during the relevant period, (i) the Senior Vice President of Human Resources and Organization Development attended a Federal Communications Bar Association Continuing Legal Education Seminar entitled "The FCC Equal Employment Opportunity (EEO) Rules," (ii) all Radio One SEUs were provided copies of the National Association of Broadcasters' *10 Steps to EEO Compliance*, and (iii) the Human Resources and Legal Departments held an FCC EEO training on June 13, 2013. On June 10, 2014, the Human Resources Department attended the 2014 Mid-Atlantic Employer Conference focusing on emerging trends designed to provide updates and solutions for FCC EEO legal compliance.

Finally, Radio One continues to have on staff in-house attorneys who specialize in employment law to ensure the Company's compliance with applicable employment laws. The Company frequently reviews its policies and procedures to determine the effectiveness of its EEO compliance efforts.

Inquiry 3(h): In accordance with Section 73.2080(c)(4), from the first day of the Station's current license term (or the date the licensee became the owner, if after that date) until the date of this letter, describe the Unit's efforts to analyze periodically its measures taken to examine pay, benefits, seniority practices, promotions, and selection techniques and tests to ensure that they provide equal opportunity and do not have a discriminatory effect. If the Unit has one or more union agreements, describe how the Unit cooperates with each union to ensure EEO policies are followed for the Unit's union-member employees and job applicants.

Response to 3(h): The Unit complies with applicable federal, state, and local laws regarding pay, benefits, seniority practices, promotions, and selection techniques and tests, and regularly reviews and updates such processes to ensure that the Unit consistently promotes equal opportunity and nondiscrimination in its hiring, promotion, retention, and compensation policies and practices. In particular, the Human Resources Department periodically conducts employee compensation analyses and also performs reviews of benefit and promotions. From time to time, and on an ongoing basis, the Human Resources Department also reviews and evaluates hiring and promotion policies, employment notifications, and job applications to ensure compliance with applicable EEO laws.

The Unit is not subject to a collective bargaining agreement or other agreement with a union.

Inquiry 3(i): If your entity is a religious broadcaster and any of its full-time employees are subject to a religious qualification as described in Section 73.2080(a) of the rules, so indicate in your response to this letter and provide data as applicable to the Unit's EEO program. For example, for full-time hires subject to a religious qualification, only a record of the hire listed by job title and date filled, the recruitment sources used for the opening, and the source of the hiree must be provided. No other records are required for those hires. If five or more full-time positions are not subject to a religious qualification, the licensee must maintain and provide all records for such hires and complete the initiatives required under Section 73.2080(c)(2). Otherwise, a religious broadcaster is not required to perform these initiatives.

Response to 3(i): The Licensee is not a religious broadcaster, and none of its full-time employees is subject to a religious qualification as described in § 73.2080(a).

Inquiry 3(j): Among items we do not need in your response to this letter are copies of applicants' resumes, your company training manuals, posters, employee handbooks, or corporate guidebooks. If you believe any of the information in various corporate manuals or posters are relevant to any part of this audit letter, you may summarize what is in them. If you believe this letter requires you to provide an usually burdensome volume of

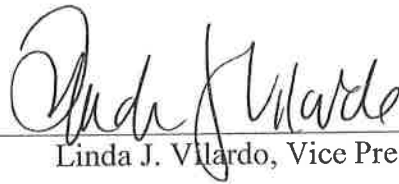
documentation, you may contact us prior to the response deadline to discuss possible ways of condensing your response.

Response to 3(j): The Unit has complied in all respects with Paragraph 3(j) of the Audit Letter.

4. Paragraph 4 of the Audit Letter does not apply because the Unit does not employ fewer than five full-time employees.
5. The Unit has complied in all respects with Paragraph 5 of the Audit Letter.
6. The Unit has complied in all respects with Paragraph 6 of the Audit Letter.
7. Paragraph 7 of the Audit Letter is not applicable.

I hereby declare that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed in Silver Spring, Maryland on this 24th day of July, 2014.



Linda J. Vilarde, Vice President